

**REMARKS**

Re-examination and allowance of the present application is respectfully requested.

Initially, Applicants thank the Examiner for discussing this application with their representative, Steven Wegman, on April 19, 2010. During the course of the interview, it was explained that the phrase “outer database” refers to the character database 108, the action database 109 and the set database 110, which are outside the image creating apparatus 100, as shown in Fig. 1 of Applicants’ drawings. The Examiner indicated that this clarified the matter, and suggested that alternative claim language be employed to better describe this feature. The substantive rejections were then discussed, during which Applicants’ representative argued that the DEVOINO et al. reference is non-analogous art. The Examiner indicated that he would consider this argument when a response to the Office Action is discussed. Revisions to the claim language was also discussed to overcome the rejections, to which the Examiner suggested clarifying that the “new text string” is a text string that partially designates a feature of the material data that is input.

In the current Office Action, claims 1-8 and 10-16 stand rejected under 35 U.S.C. §112, first paragraph as failing to comply with the written description requirement. Specifically, the Office Action asserts that the specification fails to provide support for the limitation of “using an outer database that stores the material data”.

Applicants respectfully traverse this ground of rejection, submitting that support for the limitation of “using an outer database that stores the material data” in independent claims 1 and 16 find support in paragraphs [0045] – [0048] and [0274] and Fig. 1 of U.S. Patent Application Publication No. 2008-0228713 of the present application (paragraphs [0016] – [0018] and [0244] and Fig. 1 of Applicants’ filed specification). As discussed during the above-noted interview, the

phrase “outer database” corresponds to the character data database 108, the action database 109, and the set database 110, which are located outside of the image creating apparatus. In line with an agreement reached with the Examiner, Applicants amend the language of independent claims 1 and 16 to indicate that the database is located outside of the image creating apparatus. Support for this revision may be found, for example, in Fig. 1 of Applicants’ drawings. Accordingly, Applicants submit that the claims comply with the written description requirement, and respectfully requests withdrawal of the 35 U.S.C. §112, first paragraph rejection of claims 1-8 and 10-16.

Claims 1-8, 10 and 12-16 stand rejected under 35 U.S.C. §103 as being obvious over U.S. Patent 6,654,031 to ITO et al. in view of U.S. Patent Application Publication No. 2002-0016707 to DEVOINO et al. and further in view of U.S. Patent 6,721,706 to STRUBBE et al. Dependent claims 5 and 11 stand rejected under 35 U.S.C. §103 as being obvious over ITO et al. and DEVOINO et al., and STRUBBE et al. in view of Official Notice. Applicants respectfully traverse both grounds of rejection, submitting that the prior art combinations set forth in the final Office Action fail to render the presently claimed invention obvious.

According to the presently claimed invention, a technique is disclosed for creating computer graphics of animation from text string data. According to the claimed invention, a text string/material correspondence table is provided that associates material data with material names (i.e. text strings) for the material data. A database that is located outside of an image creating apparatus stores material data, while a hierarchical structural description describes features (i.e. text strings) of the material data in a hierarchical structure. When a text string that partially designates a feature of the material data is input, a search is performed for the material data

associated with the inputted text string, using the database located outside the image creating apparatus and the hierarchical structural description. The newly searched material data is stored in the image creating apparatus, and the correspondence of the newly searched material data and the material name for the newly searched material data in the text string/material correspondence table is registered. When a material name (i.e. a text string) is input, the material data associated with the input material name using the inner text string/material correspondence table currently in use is acquired, and computer graphics is created using the acquired material data. In other words, according to the presently claimed invention, when a character string is input (i.e. a material data feature), a database located outside of the image creating apparatus is searched and the search result is registered with a storage and a text string/material correspondence table located inside the image creating apparatus.

Applicants submit that the combination of references set forth by the Examiner fail to disclose or suggest the claimed combination of features. In particular, Applicants submit that ITO et al. discloses a video program editing method, whereby the work of checking the positions of objects in a computer graphics (CG) studio and the movement of CG characters is made easier by displaying images viewed from other view points desired by the operator and differing from the camera view point of the image being displayed, during editing work of video data so as to allow creation of the program as well as edition-relevant works to be carried out. See, for example, col. 2, lines 27-39 of ITO et al. In other words, ITO et al. is directed to editing video programs. Applicants submit that this is fundamentally different from the instant

invention, in which computer graphics of animation from text string data is created.

DEVOINO et al. is directed to a computer system that automatically displays a graphic representation of natural language text. Applicants submit that this reference is non-analogous art and is fundamentally different from the present invention. During the above-noted interview, the Examiner indicated that he applied this reference because Fig. 4 discloses text and graphic representation of model data. However, Applicants submit that Fig. 4 illustrates the result of text generated graphic representation of a system. See, for example, paragraph [0011] of DEVOINO et al. That is, it appears that Fig. 4 discloses the generation of text related to graphics. See, for example, paragraphs [0037] – [0038] of DEVOINO et al. This is the opposite of the presently claimed invention, in which computer graphics animation is created from text string data. Because DEVOINO et al. is not directed to animation from text, DEVOINO et al. fails to disclose character data, action data, set data and text string/material correspondence tables that are utilized to create computer graphics of animation from text, as taught by the presently claimed invention. Thus, Applicants submit that DEVOINO et al. is non-analogous to the instant invention of creating graphic animation from text string data, as DEVOINO et al. is fundamentally different from the teaching of the instant invention, and thus, the reference is improperly applied to reject Applicants' claims.

STRUBBE et al. is directed to an interaction simulator that simulates a user's consciousness. Applicants submit that this document is also fundamentally different from the present invention of creating computer graphics of animation from text string data.

In view of the above, it is submitted that it is not possible to find a link between the technical fields to which ITO et al., DEVOINO et al. and STRUBBE et al. pertain, and the technical field of the presently claimed invention. Accordingly, Applicants submit that each reference should be disqualified as prior art pursuant to M.P.E.P. §2141.01(a). Further, since the applied references are directed to different fields of technology and to solving different problems, Applicants submit that there can be no teaching, suggestion, or motivation to combine these references in order to reject Applicants' pending claims.

During the course of the interview, the Examiner acknowledged that the present invention differs from the applied references, but indicated that the claim language of "a new text string" that is inputted is ambiguous, as every inputted text string will be a "new" text string. Thus, the Examiner suggested revising the claim language to clarify that the inputted text string is a partial text string (e.g., a text string that partially designates a feature of the material data). The Examiner indicated that this amendment would clarify the claims and would appear to overcome the applied art rejections.

Applicants thank the Examiner for this indication, and amend the claims in a manner consistent with the Examiner's intention/suggestion. Applicants note that this feature is discussed at paragraphs [0032], [0129] and [0242] of Applicants' filed specification, and refer the Examiner to these paragraph for a complete explanation therefore. In view of the present amendment to the claims, Applicants submit that the claimed invention is not obvious over the applied art of record. Thus, the Examiner is respectfully requested to withdraw the 35 U.S.C. §103 rejections, to indicate the allowability of the pending claims, and to pass this application to issue.

Applicants further submit that even if one attempted to combine the teachings of ITO et al., DEVOINO et al. and STRUBBE et al. in the manner suggested in the Office Action, one would fail to arrive at the presently claimed invention, as such combination would lack the features discussed above. Accordingly, Applicants submit that additional reasons exist for concluding the claims are allowable over the applied art of record. The Examiner is thus respectfully requested to withdraw the rejections set forth in the Office Action, indicate the allowability of the pending claims, and pass this application to issue.

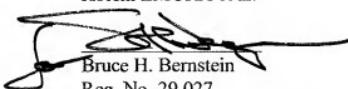
SUMMARY AND CONCLUSION

In view of the fact that none of the art of record, whether considered alone or in combination, discloses or suggests the present invention as now defined by the pending claims, and in further view of the above amendments and remarks, reconsideration of the Examiner's action and allowance of the present application are respectfully requested and are believed to be appropriate.

Should an extension of time be necessary to maintain the pendency of this application, including any extensions of time required to place the application in condition for allowance by an Examiner's Amendment, the Commissioner is hereby authorized to charge any additional fee to Deposit Account No. 19-0089.

If there should be any questions concerning this application, the Examiner is invited to contact the undersigned.

Respectfully submitted,  
Koichi EMURA et al.



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